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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

J.R.G., et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA,  
Defendant.

CASE NO. 4:22-cv-05183-KAW

**STIPULATION FOR CONTINUANCE OF  
CASE MANAGEMENT CONFERENCE AND  
[PROPOSED] ORDER**

Plaintiffs J.R.G., et al., (“Plaintiffs”) and Defendant United States of America (“Defendant”)  
(collectively, the “Parties”), by and through their respective counsel, hereby stipulate and agree,  
pursuant to Civil Local Rule 7-12 and subject to the Court’s approval, as follows:

STIPULATION FOR CONTINUANCE OF CMC AND [PROPOSED] ORDER  
CASE NO. 4:22-CV-05183-KAW

1 WHEREAS, on May 16, 2023, the Court issued Initial Case Management Conference Minute  
2 Order (Dkt. 49) scheduling a Further Case Management Conference for September 26, 2023 at 1:30pm.

3 WHEREAS, since the May 16, 2023 Case Management Conference, the Parties have produced  
4 hundreds of thousands of pages of discovery as contemplated by their agreed-upon 90-Day Disclosure  
5 period (*see* Dkt. 48 at 6-7), and the Parties are currently reviewing those productions.

6 WHEREAS, the Parties have no other substantive updates or issues requiring the Court's  
7 attention at this time.

8 NOW THEREFORE, the Parties stipulate that the Case Management Conference currently  
9 scheduled for September 26, 2023, be continued to a date on or after November 14, 2023.

10 DATED: September 18, 2023

Respectfully submitted,

11 ISMAIL J. RAMSEY  
12 United States Attorney

13 /s/ Kenneth W. Brakebill  
14 Kenneth W. Brakebill  
15 Kelsey J. Helland  
16 Assistant United States Attorneys

17 *Counsel for Defendant*

18 DATED: September 18, 2023

LAW OFFICE OF JULIANNA RIVERA

19 /s/ Julianna Rivera  
20 Julianna Rivera Maul

21 NORTHWEST IMMIGRANT RIGHTS PROJECT

22 /s/ Matt Adams  
23 Matt Adams  
24 Aaron Korthuis

25 *Counsel for Plaintiffs*

26  
27 STIPULATION FOR CONTINUANCE OF CMC AND [PROPOSED] ORDER  
28 CASE NO. 4:22-CV-05183-KAW

**[PROPOSED] ORDER**

Pursuant to Stipulation, and good cause appearing, IT IS SO ORDERED that the Case Management Conference currently scheduled for September 26, 2023 is continued to \_\_\_\_\_ . A Case Management Statement shall be filed 7 days prior to the Case Management Conference.

Dated: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE KANDIS A. WESTMORE  
United States Magistrate Judge